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6
7 UNITED STATES DISTRICT COURT

8 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION
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10 TAMARA WAREKA p/k/a TAMARA
WILLIAMS,

11 Plaintiff,

12 vs.

13 ELSIE GREEN INC. and DOES 1 through 10,
14 inclusive,

15 Defendants.
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Case No. 4:23-cv-03160-HSG

**JOINT STIPULATION AND ORDER TO
EXTEND TIME TO ANSWER OR
OTHERWISE RESPOND TO
COMPLAINT AND TO CONTINUE
INITIAL CASE MANAGEMENT
CONFERENCE (as modified)**

The Hon. Haywood S. Gilliam, Jr.

Action Filed: June 26, 2023
Trial Date: Not Set

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STIPULATION AND ORDER TO EXTEND TIME TO
RESPOND TO COMPLAINT AND TO CONTINUE
INITIAL CMC

- Case No. 4:23-cv-03160 HSG

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Pursuant to Civil L.R. 6-1(b), 6-2, and 7-12, Defendant Elsie Green, Inc. (“Defendant” or “Elsie Green”) and Plaintiff Tamara Wareka p/k/a Tamara Williams (“Plaintiff” or “Wareka”) respectfully submit this joint stipulation to continue the deadline for Defendant to answer or otherwise respond to the Complaint and to continue the Initial Case Management Conference (“CMC”):

WHEREAS on June 26, 2023, Plaintiff filed the Complaint (Dkt. No. 1);

WHEREAS on June 27, 2023, the Court issued an order setting an initial CMC for September 26, 2023, at 2:00 p.m., along with related deadlines (Dkt. No. 6);

WHEREAS on September 20, 2023, Plaintiff served its Complaint on Defendant (Dkt. No. 9);

WHEREAS on October 10, 2023, pursuant to the parties’ stipulation, the Court issued an order extending Defendant’s time to answer or otherwise respond to the Complaint to November 22, 2023 and continuing the initial CMC to December 12, 2023 (Dkt. Nos. 14 and 15);

WHEREAS on November 20, 2023, pursuant to the parties’ stipulation, the Court issued an order extending Defendant’s time to answer or otherwise respond to the Complaint to December 20, 2023 and continuing the initial CMC to January 9, 2024 (Dkt. Nos. 16 and 17);

WHEREAS the parties are currently discussing an early resolution and would benefit from additional time, and have agreed to (i) an extension of Defendant’s deadline to answer or otherwise respond to the Complaint, to and including January 31, 2024; and (ii) an extension of the initial CMC, to and including February 20, 2024;

WHEREAS this is Defendant’s third request for an extension of time;

WHEREAS this extension of time will alter the date of the initial CMC, and the related deadlines, already fixed by Court order;

WHEREAS this stipulation is made without prejudice to any party requesting a further continuance for good cause shown;

NOW, THEREFORE, THE PARTIES HEREBY STIPULATE, and request that the Court order, as follows:

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STIPULATION AND ORDER TO EXTEND TIME TO
RESPOND TO COMPLAINT AND TO CONTINUE
INITIAL CMC

1 1. Defendant's time to answer or otherwise respond to the Complaint shall be
2 extended to **January 31, 2024**.

3 2. The initial Case Management Conference shall be continued to **February 20, 2024**,
4 at 2:00 p.m., or as soon thereafter as is convenient for the Court.

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6 Dated: December 15, 2023

FARELLA BRAUN + MARTEL LLP

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8 By: /s/ Sushila Chanana
Sushila Chanana

9 Attorneys for Defendant ELSIE GREEN, INC.

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11 Dated: December 15, 2023

HIGBEE & ASSOCIATES

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13 By: /s/ Mathew K. Higbee
14 Mathew K. Higbee

15 Attorneys for Plaintiff TAMARA WAREKA f/k/a
16 TAMARA WILLIAMS

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18 **ATTESTATION**

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20 I, Sushila Chanana, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that concurrence in
21 the filing of this document has been obtained from each signatory hereto.

22 /s/ Sushila Chanana
23 Sushila Chanana

24 Attorneys for Defendant ELSIE GREEN, INC.


PURSUANT TO STIPULATION, IT IS SO ORDERED:

1. Defendant Elsie Green, Inc.'s time to answer or otherwise respond to the Complaint shall be extended to **January 31, 2024**.

2. The initial Case Management Conference shall be continued to **February 20, 2024**, at 2:00 p.m., or as soon thereafter as is convenient for the Court. The dial-in information and instructions remain the same as previously provided in docket no. 8.

3. The Court cautions the parties that it is unlikely to further extend these deadlines absent good cause.

Dated: 12/18/2023


The Honorable Judge Haywood S. Gilliam, Jr.
U.S. District Judge